

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
(Jackson Division)

THE UNITED STATES OF AMERICA )  
and THE STATE OF MISSISSIPPI, )

Plaintiffs, )

v. )

THE CITY OF JACKSON, MISSISSIPPI, )

Defendant. )

Case No. 3:12-cv-790 TSL-JMR

---

**JOINT MOTION TO ENTER CONSENT DECREE**

---

COME NOW, the United States of America and the State of Mississippi, and hereby respectfully request that the court approve the proposed Consent Decree lodged in this matter on November 11, 2012 (Docket #2). The grounds for this Motion are set forth in the accompanying Memorandum in Support of Joint Motion to Enter Consent Decree being filed simultaneously herewith, and a copy of the previously lodged Consent Decree is being provided electronically to the Judge's chamber as well.

Dated: March 1, 2013

Respectfully submitted,

IGNACIA S. MORENO  
Assistant Attorney General  
United States Department of Justice  
Environment and Natural Resources Division

/s/Karl J. Fingerhood

KARL J. FINGERHOOD  
Trial Attorney (PA Bar ID No. 63260)  
Environmental Enforcement Section  
Environment and Natural Resources Division  
U.S. Department of Justice  
P.O. Box 7611  
Washington, D.C. 20044  
Telephone: (202) 514-7519  
Facsimile: (202) 514-009

[karl.fingerhood@usdoj.gov](mailto:karl.fingerhood@usdoj.gov)

GREG DAVIS  
United States Attorney  
Southern District of Mississippi

SAMUEL LYNN MURRAY  
(MS Bar ID No. 3690)  
Assistant U.S. Attorney  
Southern District of Mississippi  
501 E. Court St., Ste. 4.430  
Jackson, MS 39201  
Tel: 601-973-2835  
Fax: 601-965-4032

Of Counsel:

WILLIAM B. BUSH, JR.  
Associate Regional Counsel  
United States Environmental Protection Agency  
Region 4  
61 Forsyth Street  
Atlanta, GA 30303  
Telephone: 404-562-9538  
Fax: 404-562-9486

ATTORNEYS FOR PLAINTIFF  
UNITED STATES OF AMERICA

Dated: March 1, 2013

/s/ Christopher G. Wells with permission by KJF

CHRISTOPHER G. WELLS

Senior Attorney

Office of Pollution Control

Mississippi Department of Environmental Quality

P.O. Box 2261

Jackson, MS 39225

Telephone: 601-961-5545

Facsimile: 601-961-5674

[Chris\\_Wells@deq.state.ms.us](mailto:Chris_Wells@deq.state.ms.us)

ATTORNEY FOR PLAINTIFF STATE OF MISSISSIPPI BY AND THROUGH THE  
MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY AND THE MISSISSIPPI  
DEPARTMENT OF ENVIRONMENTAL QUALITY